

CONTINUATION OF APPLICATION FOR COMPLAINT

I, Scott Przekop, being first duly sworn, hereby depose and state as follows:

Introduction and Agent Background

1. This continuation is submitted for the purpose of obtaining an arrest warrant for ELFIDO MARQUEZ MARTINEZ for violations of 18 U.S.C. § 1546(a) by knowingly possessing fraudulent I-551 Permanent Resident Cards and Social Security Cards.

2. I am a special agent (“SA”) of the Department of Homeland Security (“DHS”), Immigration and Customs Enforcement (“ICE”), Homeland Security Investigations (“HSI”), and as such am an investigator or law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations and make arrests for offenses enumerated in 18 U.S.C. § 2516 and 8 U.S.C. § 1357.

3. I have been employed as a special agent with DHS/ICE/HSI since February 2007. I am currently assigned to the HSI Office in Grand Rapids, Michigan.

4. During my employment, I have participated in several investigations involving human and labor trafficking, and as part of those investigations, often document violations related to harboring certain undocumented immigrants (aliens) in violation of 8 U.S.C. § 1324. As a result of those investigations, I have arrested targets and seized evidence related to the trafficking offenses and secured fines and restitution for victims in subsequent court proceedings. I have participated in and/or executed search and seizure warrants authorizing the search of locations used by

those involved in human or labor trafficking and have searched locations used to harbor undocumented immigrants. I have also identified and searched vehicles used to transport undocumented immigrants in furtherance of harboring or trafficking investigations. Materials searched for and recovered in these locations have included cellular telephones, ledgers, business documents and fraudulent identification documents.

5. The facts in this continuation come from my personal observations, my training and experience, and information obtained from other agents, witnesses, records, and sources. This continuation is intended to show merely that there is sufficient probable cause for the requested arrest warrant and does not set forth all my knowledge about this matter.

Probable Cause

6. In May of 2023, I was in contact with an employee of Arnulfo Ramirez-Villanueva¹ named ELFIDO MARQUEZ MARTINEZ, a citizen of Mexico, who last entered the United States as a tourist, using what is commonly called a “B2 visitor visa” in 2016. In April 2016, K Buena Products, requested a TN Trade Visa for MARQUEZ MARTINEZ so that he could work as an accountant for the company for one year. A review of his Non-Immigrant Visa (NIV) record indicates his TN Trade Visa was granted but then revoked in April of 2017 because MARQUEZ MARTINEZ

¹ Ramirez-Villanueva is a businessman based in Williamston, Michigan who owns and operates over 20 restaurants and numerous other businesses, including the Los Tres Amigos restaurant chain and a tortilla distribution company named K Buena Products.

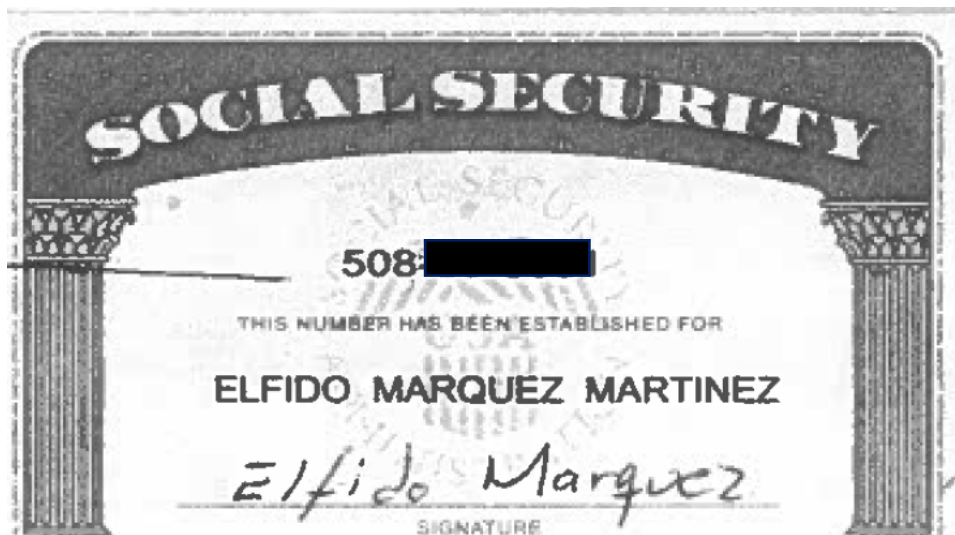
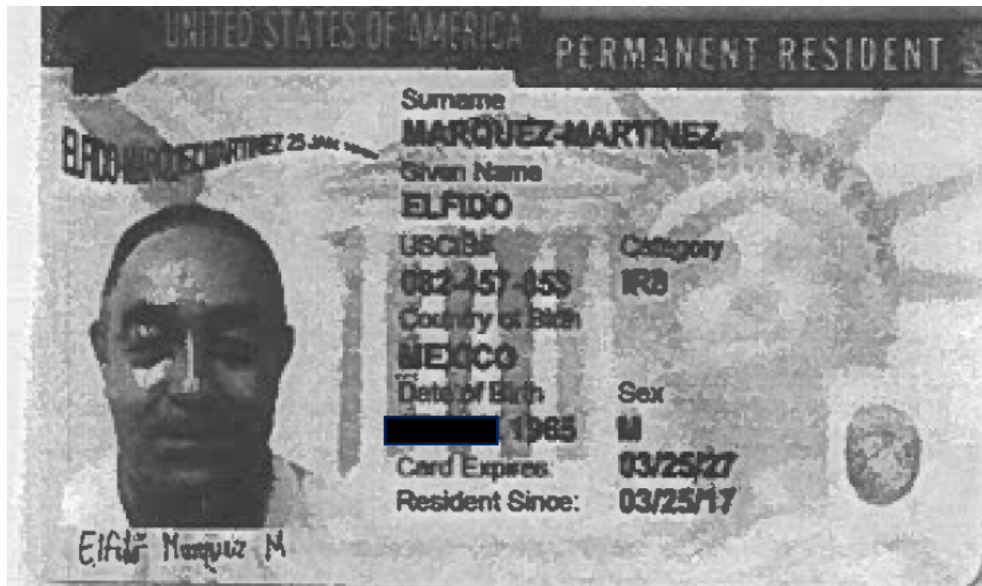
presented a fraudulent Mexican educational credential as part of his qualifying information to obtain the visa. MARQUEZ MARTINEZ therefore has no legal status to remain in the United States on an expired tourist visa and revoked employment visa.

7. On May 17, 2023, I interviewed MARQUEZ MARTINEZ, a self-identified “accountant” for the Los Tres Amigos chain of restaurants, while conducting a consent search of his residence located at 5029 Kessler Drive in Lansing, Michigan. MARQUEZ MARTINEZ advised that his residence, 5029 Kessler Drive, in Lansing, Michigan, the vehicle he drives, and his cellular telephone, are all provided by his employer, the Los Tres Amigos restaurant chain.

8. During the consent search of the areas under MARQUEZ MARTINEZ’s control within the 5029 Kessler Drive residence, agents discovered a set of six fraudulent I-551 Permanent Resident Cards, with six corresponding fraudulent Social Security Cards, including a set in MARQUEZ MARTINEZ’s name pictured below. The fraudulent documents were located in MARQUEZ MARTINEZ’s bedroom. When asked about the fraudulent Social Security Cards and I-551 Cards, MARQUEZ MARTINEZ claimed a previous resident left the documents behind and he decided to keep them.² MARQUEZ MARTINEZ signed an abandonment form and turned the

² This statement conflicts with the facts that: 1) MARQUEZ MARTINEZ had lived at the Kessler residence for at least several months before the May 2023 search and the documents were found in his bedroom, 2) two of the documents were in his own name; and 3) the fraudulent Social Security Card in his name was signed while the other 5 were not; 4) MARQUEZ MARTINEZ used the listed social security number in employment paperwork.

fraudulent documents over to the agents on scene. Below are photographs of the fraudulent documents in MARQUEZ MARTINEZ's name³:



9. In February 2025 the Federal Bureau of Investigation (FBI), reviewed employment and payroll data for the Los Tres Amigos restaurant chain. These records show that MARQUEZ MARTINEZ has received payments from the

³ I have redacted the date of birth and SSN on the photographs to protect personally identifiable information. I can provide the Court and unredacted copy upon request.

restaurant chain as recently as December 26, 2024. The accounting profile from the employer indicates MARQUEZ MARTINEZ is using the same Social Security Number (SSN) which appears on the fraudulent SSN obtained from the 5029 Kessler Drive residence on May 17, 2023 (see above photograph). Investigators verified with the Social Security Administration that this SSN is not a match to MARQUEZ MARTINEZ.

10. I am advised by the United States Attorney's Office that it is a violation of 18 USC § 1546(a) where:

- A. The defendant knowingly possessed an immigrant or nonimmigrant visa or document prescribed by statute or regulation for entry into or as evidence of authorized state or employment in the United States;
- B. the immigrant or nonimmigrant visa or document prescribed by statute or regulation for entry into or as evidence of authorized stay or employment in the United States was forged, counterfeited, altered, falsely made, procured by means of a false statement, procured by fraud, or unlawfully obtained; and
- C. the defendant knew the immigrant or nonimmigrant visa or document prescribed by statute or regulation for entry into or as evidence of authorized stay or employment in the United States was forged, counterfeited, altered, falsely made, procured by means of a false statement, procured by fraud, or unlawfully obtained.

11. U.S. Citizenship and Immigration Services (USCIS) provides an online Handbook for Employers (M-274), which defines documents that can be used to verify employment eligibility on a Form I-9 Employment Eligibility Verification. Under List A: Documents That Establish Both Identity and Employment Authorization, a Form I-551, Permanent Resident Card, can be used to establish both identity and employment authorization. Furthermore, under List C: Documents That Establish Employment Authorization, a Social Security Account Number card (SSN), can be used to establish employment authorization.

12. Based on the information presented above, there is probable cause to believe that Elfido MARQUEZ MARTINEZ, a citizen of Mexico, lacking a valid status to remain in the United States, has violated 18 U.S.C. § 1546(a) by knowingly possessing fraudulent I-551 Permanent Resident Cards and Social Security Cards, particularly a set in his own name.